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PAUL DEROHANNESIAN, ESQ. (1953-2001)

PAUL DEROHANNESIAN II, ESQ.

DANIELLE R. SMITH, ESQ.

April 22, 2019

Via ECF

Honorable Nicholas G. Garaufis
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

RE: *United States v. Raniere, et al.* No. 18-cr-204 (NGG)

Dear Judge Garaufis:

We represent Mr. Keith Raniere in the above matter. We write concerning the jurors being brought in Tuesday, April 23, for questioning. Below please find the jurors questionnaire numbers we would ask the Court to follow-up on.

#	Defendant's Questionnaire Numbers
74	4, 38, 39, 40, 41, 75, 84(b), 91
77	4, 34, 41, 51-54, 71(b), 75, 95
78	1, 23
80	4, 36, 45, 87
82	1, 2, 42, 44, 45, 47(c), 52, 71(b), 75-76
89	1, 34, 71, 84(b), 88, Attachment A
90	1, 2, 39, 52, 75, 76, 92, 94
92	1, 40, 45, 50, 75, 87, 90
94	4, 5, 39, 40, 47, 71(b), 74, 75, 76, 80, 90, 91, 94, Attachment A
95	1, 4, 38, 39, 40, 44, 45, 52, 53, 54, 75, 76, 80(c), 84, 90, 91, 95
96	1

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97	4, 33, 45, 51-52
100	47, 83, 84, 85
102	1, 39, 51, 54, 73(b), 74, 75, 76, 91, 93
104	2, 25, 37, 38, 39, 40, 41, 63, 75, 78(b), 84, 87, 91-94, 95
105	5, 33(b), 66, 67
106	3, 4, 38, 45, 51, 52, 54, 64, 66(b), 75, 90, 95
107	2, 25, 51, 52, 54, 75, 76
108	1, 2, 23-24, 67(d)
109	1, 38, 39, 40, 46, 62, 74, 75, 78
110	2, 37, 39, 40, 52, 54, 84(b)
111	41
112	25, 38, 40, 52, 76, 81
113	75, 80(c), 86, 87, 90, 91, 94
114	40, 75
116	45, 60
117	16(a), 25, 26, 56, 62, 66(b), 71(b), 73(b)
120	4, 27
122	
124	1, 16, 37, 38, 41, 84(b)
125	1, 41, 75
126	4, 41, 47(b), 67, 75, 84(b),
131	1

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132	2, 3, 37, 38
133	4
137	80(a)
138	5, 40, 84(b)
140	1, 2, 66(b), 76
141	4, 33(b) Question: Did you follow the trial(s) of Mr. Ed Mangano or Mr. John Venditto?, 39, 62, 75, 84(b), 91
142	25, 37, 38

Thank you for your consideration in this matter. Please feel free to contact my office with any questions or concerns.

Very truly yours,

/s/ Paul DerOhannesian II

DerOhannesian & DerOhannesian

Paul DerOhannesian II

Danielle R. Smith

PDII:drs

cc: Counsel for all defendants (*via electronic mail*)
AUSAs Moira Kim Penza, Tanya Hajjar, and Mark J. Lesko (*via electronic mail*)